

UNITED STATES DISTRICT COURT

for the

Southern District of Texas
Houston Division

Natielia Naceen Hall

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

United Continental Holding

United Airlines HSC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Natielia Naceen Hall

Street Address

1550 Leona Street Apt 481

City and County

Houston Texas 77009

State and Zip Code

Harris County

Telephone Number

(504) 941-2246

E-mail Address

Ching19@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Delzy Rosa
United Airline
233 S. Wacker Dr Ste 710
Chicago
IL 60606

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Christopher Betts
United Airlines
233 S Wacker Dr
Chicago
IL 60606

Christopher . betts @ united . com

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Anna Mikuta
United Airlines Senior Payroll Management
2609 Main St HSCPZ 16th Floor
Houston Harris County
Texas 77002

346 - 265 - 6029
anna.mikuta @ united . com

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Tamisha Hodges
IAM Union Rep
900 Grand Plaza Dr
Houston, Harris County
Texas 77067

832-235-2695 832-229-6446
tamisha . hodges bridge forth @
united . com

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name

Street Address

City and County

State and Zip Code

Telephone Number

United Airlines INC
 900 Grand ~~Marina~~ Plaza De
 Houston Harris County
 Texas 77067

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law (specify the federal law):

Identity Theft



Relevant state law (specify, if known):

California Employment



Relevant city or county law (specify, if known):

Los Angeles code of Jurisdiction Laws

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts *(specify)*: _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

6/2023, 3/2023, 8/2022

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race _____
- ☐ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
- ☒ disability or perceived disability *(specify disability)*

bipolar and musculoskeletal disease

E. The facts of my case are as follows. Attach additional pages if needed.

My petition of Wrongful termination
and Identity Theft Please Read attachment

Please read attachment

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

September 17, 2023

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date) 10/31/2024.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Requesting United Airlines Remove Job Abandonment Letter from my employee records and any history search. Removal of Right for Rehire. Request Compensation from United Airline for damages to my Identity that I have to Continue to pay for Security from United Employees, moving

expenses, Equifax Employment correction that prohibiting me from getting employment with United Airlines partners. ~~to my~~ with disability. Exact amounts have not been calculated because of ongoing activities.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/24/2025

Signature of Plaintiff

Printed Name of Plaintiff

Natelia Hall
Natelia Hall

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Bob Casey United States Courthouse
515 Rusk Avenue
Houston, TX 77002

Natielia Hall
EEOC case # 460-2023-08379
PO Box 3771
Houston, Tx 77253

January 24, 2025

Dear: Honorable Judge of US Southern
District Court

My petition to the US Southern District Court to pursue the wrongful termination claim against United Airlines INC and United Continental Holding HSC along with IAM Union due ongoing contact from United Employees.

United Airlines are failing to recognizes and acknowledge their employees are involved in or refusal to follow the procedures with United Airlines Website HelpHub. This is based on my current contact with United Airlines employees that has no knowledge of my EEOC case and Jackson Lewis Position Statement.

Jackson Lewis Position Statement falsely stated I, Natielia Hall, was not in contact and failed to correspond with United Airlines. I, Natielia Hall, was in contact with United Airlines because within my 30 Personal Leave of Absence; I received a letter of Medical Benefits Termination. Then United Airlines Chicago Corporate Office had Houston Contact Center Division Manager "Keith" to call me by phone in regards to my whereabouts and verification of address. This is written incorrectly in Jackson Lewis Position Statement. For the reason it mentions the change in 30-day PLOA to 30 day Authorized Unpaid Time Off Leave (AUTO). The confusion was not to keep my medical insurance, the actual fact I was just approved for Social Security Benefits such as Medicare. This proved my claim of a "woman" for United Airlines called I could not remember her name, but she was telling me I needed to complete a Medical Evaluation. Per that phone conversation I was supposed to have done this at the time of hiring. She said a

Medical Evaluation packet will be mailed to my address. Not the RAP form, she said NOT THE RAP FORM. So, upon reading Jackson Lewis Position Statement to be a discussion. United Airlines never mailed this Medical Evaluation Packet, I have proof that I contact United States Postal Service reporting missing mail and mail tampering. I also have proof of payment changing the locks on my mailbox. United Airlines never mailed Family medical Leave Act FMLA documents.

Another factor is the deactivation of my employee badge round about 06/15/2023 or why my termination letter states to mail the badge to Los Angeles Union office. I was in communication with United Airlines, because United Airlines Employees at 609 Main St Houston Tx 77002 advised me to DO NOT MAIL THE BADGE TO LOS ANGELES UNION OFFICE. Around about June 15, 2023 I went to United Airlines Contact Center to retrieve a personal item for my desk. On arrival I found out my badge was deactivated; Security would not allow me into the building without clearance from my supervisor. Security informed me to contact United HelpHub for details. So, I WAS NOT ABLE TO RETURN TO DUTY ON JUNE 19, 2023.

My petition for reason of Identity Theft, base on the payroll income document sent from United Airlines to Social Security Administration. Upon on receiving my Social Security Approval Letter, I received paperwork about my employment and a program called TICKET TO WORK. This Social Security paperwork had my name but someone else address. My initial reason for requesting PLOA, I was contacted by a social security employee and my attorney Kristi Ward Stephens requesting me to leave work immediately and contact a social security employee. Reason being United Airlines submitted wrong employment payroll documents to Social Security Administration. This proves I was in repeatedly contact with United Airlines. The Social Security Administration employees stated United Airlines had stop all communication about my payroll; they requested that I provided proof of employment on a United Airlines letterhead document.

Therefore, I was in contact with United Airlines about my employment repetitively. I repeatedly emailed United HelpHub and call into United Airlines Attendance Line.

Honorably Judge: I, Natielia Hall, am requesting that my claim of wrongful termination be pursued due to I had informed Manager Wendy Martinez and FBI

Special Victims Agent Olga DeLaRosa about the activity I experienced in the work place. I had question about certain individuals. I kept receiving phone calls from United Airlines Mileage Plus Department but not United Airlines Contact Center Management or Benefits Department. This was explained to Manager Wendy Martinez and Anna Mikuta Senior payroll Management.

I had to submit proof of Medical Insurance to an Attorney of Aetna Medical Insurance about proof of my United Airlines benefits.

I have included emails communication proving I submitted the medical doctor office visitations of medical treatment. My reason for claiming Discrimination is because whomever was the employee that requesting Medical Evaluation never submitted any evidence or reasoning to United Airlines Corporate Office. Every single point of contact at United Airlines said They had no information or was not aware of the request. The Rap Form is only used if I, Natielia Hall, want medical leave or accommodation at work.

I was trying to return to work using Social Security affiliate program TICKET TO WORK.

This case is about a United Airlines Employees requesting medical proof of disability; in which I have the right to keep my disability disclosed unless it is requested through the United Airlines Policy and Procedures. These United Airlines Employees are still in pursuit of my disability information. My question to United Airlines; whom is person?

Sincerely
Natielia Hall